

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OUSMANE BAH,

Docket No.: 1:19-cv-03539-PKC

Plaintiff,

-against-

APPLE INC., et al.

DECLARATION IN SUPPORT
OF OMNIBUS OPPOSITION
MEMORANDUM
TO MOTION TO DISMISS

Defendants.

_____ /

Subhan Tariq, an attorney duly admitted to practice in the Southern District of New York, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an attorney-at-law licensed to practice in the United States District Court for the Southern District of New York. I am the managing attorney at The Tariq Law Firm, PLLC, attorney for Plaintiff, Ousmane Bah in the above-captioned case. In that capacity, I have knowledge of the facts stated herein.
2. This declaration is submitted in support of the above-mentioned Plaintiff's Omnibus Opposition Memorandum to Motion to Dismiss. I am familiar with the facts and circumstances stated herein based upon personal knowledge and review of the file in this matter.
3. Attached as Exhibit "1" is a true and accurate copy of Plaintiff's Temporary New York State Learner's Permit.
4. Attached as Exhibit "2" is a true and accurate copy of Defendant John Woodruff's November 15, 2018 email to Defendant Detective John Reinhold.

5. Attached as Exhibit "3" is a true and accurate copy of Defendant Apple Inc.'s and Security Industry Specialist's Inc.'s Counsels' response letters to Plaintiff's Motion to Compel.
6. Attached as Exhibit "4" is a true and accurate copy of Declaration of Tom Stevens.

Dated: November 13, 2020

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Subhan Tariq', is written over a horizontal line.

Subhan Tariq, Esq.
Attorney I.D.# ST9597
The Tariq Law Firm, PLLC
Attorney for Plaintiff
34-18 Northern Blvd – Suite 2-25
Long Island City, NY 11101
Telephone: (718) 674-1245
Facsimile: (516) 453-0490
Email: subhan@tariqlaw.com